

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

KATHY JONES,

Plaintiff,

VS.

DOLGENCORP, INC.,

Defendant.

CIVIL ACTION NO.:

2:06-cv-927-MEF

REPORT OF PARTIES' PLANNING MEETING

1. Appearances. On November 13, 2006, the parties' planning meeting was held via telephone and was attended by:

Roman A. Shaul for the Plaintiff, and

Ryan M. Aday for the Defendant

2. Pre-Discovery Disclosures. The parties will exchange by **December 11, 2006**, the information required by FRCP 26 (a)(1).

3. Discovery Plan. The parties jointly propose to the court the following discovery plan:

a. Discovery will be needed on the following subjects:

1. All information pertaining to Plaintiff's claims and damages;

2. The Defendant's defenses.

b. All discovery must be commenced in time to be completed by **August 10, 2007**.

c. There will be a maximum of 30 interrogatories, including discrete subparts, by each party to any other party. The responses will be due 30 days after service, unless served by mail in which responses will be due 33 days after service.

d. There will be a maximum of 30 requests for production of documents, including discrete subparts, by each party to any other party. The responses will be due 30 days after service, unless served by mail in which responses will be due 33 days after service.

e. There will be a maximum of 30 requests for admission, including discrete subparts, by each party to any other party. The responses will be due 30 days after service, unless served by mail in which responses will be due 33 days after service.

f. The parties agree that no more than 8 depositions may be taken by a party without leave of court or agreement of the parties, with a maximum time of eight hours per deposition, unless extended by agreement of parties.

g. Reports from retained experts under Rule 26(a)(2) will be due from the Plaintiffs by **April 9, 2007**, and from the Defendant by **May 11, 2007**.

h. Supplementation of the core disclosures under Rule 26(e) will be due 30 days after the date the party learns that the information previously provided is incomplete or incorrect and not later than 45 days prior to the discovery cut-off established by the parties, subject to good cause being shown.

4. Other Items.

a. Scheduling Conference: The parties do not request a scheduling conference with the court before entry of the scheduling order.

- b. Additional Parties, Claims and Defenses: Plaintiff must join additional parties and amend the pleadings by **February 1, 2007**. The Defendant will have until **March 1, 2007**, to join additional parties or defenses.
- c. Dispositive Motions: All potentially dispositive motions must be filed by **July 9, 2007**.
- d. Settlement: Settlement and the possibility for mediation cannot be evaluated until discovery has begun.
- e. Pretrial Conference: The parties request a final pretrial conference 30 days before trial.
- f. Trial Evidence: The final list of witnesses and trial evidence under Rule 26(a)(3) should be due 21 days before trial. The parties should have 11 days after service of the final lists of trial evidence to list objections under Rule 26(a)(3).
- g. Trial Date: The case should be ready for trial by **November 5, 2007**, and is expected to last a minimum of three days.

Dated: November 13, 2006

Respectfully submitted,

/s/ Ryan M. Aday

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